



LAW OFFICES OF PETER D. BARON, PLLC

ATTORNEYS AND COUNSELORS AT LAW

532 Broadhollow Road, Suite 114

Melville, New York 11747

TEL: (631) 367-7000 • FAX: (631) 367-7908

Email: legal@peterbaronlaw.com

Peter D. Baron*
Jordan R. Bobrow
Martin L. Baron
(1925-2004)

Paralegals
Marie J. Spero
Nicole Tedesco
Jocelyn S. Verbeeck

Of Counsel:
Hon. John Andrew Kay**

* Also Admitted in NJ
** Also Admitted in DC

March 5, 2021

Honorable Gary R. Brown
United States District Judge
Eastern District of New York
100 Federal Plaza, Courtroom 840
Central Islip, New York 11722

Re: McDowall et al. v. ILKB LLC, et. al.
Docket Number: 2:20-cv-06171-GRB-AKT

Dear Judge Brown:

Pursuant to the March 2, 2021 Order, the parties conferred regarding a forthcoming Amended Complaint. Subject to your Honor's approval, the parties stipulate that Plaintiff shall file an Amended Complaint on or before April 9, 2021. Defendant shall respond to the Amended Complaint in normal course pursuant to the Federal Rules. Upon review of Plaintiff's Amended Complaint, Defendants shall either file an Answer or renew their letter request for a pre-motion conference.

I hope this clears up any ambiguity and satisfies the Court's request.

Respectfully submitted,

Peter D. Baron, Esq

PDB/jrb

cc: Peter Siachos, Esq. (VIA ECF)